

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Warren Easly
Plaintiff

| No 1:21-cv-251

FILED

John Wetzel et al.
Defendants

| Honorable Judge Susan Baxter

JUN 21 2023

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

Brief in support of motion to compel discovery and
Pursue sanctions

This is a §1983 civil action filed by a pro-se litigant currently at S.C.I. Rockview seeking monetary and compensation damages also injunctive and declaratory relief based on excessive force, Failure to protect, retaliation, Failure to train, cruel and unusual punishment, Failure to intervene, deliberate indifference.

Facts

Plaintiff has pursued discovery with defendants for 8+ months and have been unsuccessful. Plaintiff have been met with uncooperation, not provided documents, objections in bad faith, provide vague and unresponsive answers. Defendants have stated they sent documents requested in response but plaintiff never received. Plaintiff knows at this point defendants do such in bad faith as the magistrate judge gave them a order to provide discovery but did not. Defendants have sent the same medical progress notes 4 times totalling to over 2000 pages in bad faith. same documents sent 4 times. Clearly in bad faith. Plaintiff has wrote defendants letters to solve discovery issues to no avail.

Argument - Point 1

The discovery requested is very much correlated and relevant towards this civil claim.

Defendants have disregarded plaintiffs request for discovery along with judges order granting plaintiffs motion to compel.

Defendants have not provided discovery that will

be presented at trial / Summary Judgment. Such request

are relevant towards this civil action but defendants have

not provided clear / concise responses to interrogatories

document request nor videos. Plaintiff cannot litigate pro se

or provide a proper defense in this civil claim as

the discovery is refused to be provided by the

defendants or vague responses are provided which

is reiterated below.

Interrogatories (Wright) Exhibit # 1 First question "How long have you worked for the department of corrections? Please include titles."

which is a standard question. Defendants did not

answer such question stating they need more time to get with authorities with such a simple question.

which is in bad faith. Not to mention defendants was

given 5th-7 months to get with "the proper authorities"

to answer such a simple question all C.O.s know or any professional.

question-3 How many cell extractions have you been a part

of since you worked for the D.O.C. If you do not know

the exact #, please estimate. Defendants provide a vague

and evasive response stating the don't have

question #4 All video footage, documents, photographs, incident reports, interviews/investigations on 8-27-19 that is described in complaint or is related to such.

(Escort in restraint chair) Defendants state there are no documents for 8-27-19. This response is in bad faith as plaintiff clearly put 8-27-19 as the date plaintiff is requesting documents. Plaintiff's response is in bad faith. Request all documents, photographs, incident reports, interviews/investigations on 8-27-19.

question #5 All video footage, documents, photographs, incident reports, interviews/investigations on 8-29-19 that is described in complaint or is related to such (escort in restraint chair)

Defendants state see restriction forms below. First no restriction forms were provided. This response is in bad faith as plaintiff requested documents, videos, photographs pertaining to incident in complaint on 8-29-19.

question #6 All video footage, documents, photographs, incident reports, interviews/investigations on 10-7-19 that is described in complaint or is related to such. (Escort in restraint chair)

Defendants state see restrictions below. This was nothing pertaining to restrictions. Defendants response is in bad faith.

Plaintiff requested documents, videos, photographs ETC. regarding escort in restraint chair on 10-7-19. Defendants response

is unresponsive and clearly in bad faith. This is after a magistrate judge ordered defendants to provide plaintiff with

Discovery after 7 plus months of ignoring plaintiff.

Defendants disregard judge order and rules of civil procedure. No documents have been provided regarding 10-7-19 (escort in restraint chair.)

question # 7 All video footage, documents, photographs, incident

reports, interviews/investigations on 10-7-19 that is described

in complaint or is related to such. (Excessive force while

in cell) Defendants state "See restriction forms

provided below" in bad faith. This is not regarding no

restrictions. Plaintiff request documents, videos, photographs regarding

a excessive force claim. Defendants provide no documents

regarding such although such exist. Please see exhibit # 17

which states "Your claims were investigated and that

investigation was reviewed by the Bureau of investigation

and intelligence." But defendants withhold such documents

and video in bad faith which supports questions as

Judge Lazillo gave defendants a order to provide

all discovery due to plaintiff being granted a

motion to compel. Defendants response is in bad faith.

question # 8 All video footage, documents, photographs, incident

reports, interviews/investigations on 12-10-19 that is described

in complaint or is related to such (Escort in restraint chair.)

Defendants response is "See restriction forms below"

such is mind boggling that defendants send such

response after having this request for 7 months and

ordered by a Judge to provide discovery, this response

is just clearly in bad faith clear disregard of
Judge's orders and rules of civil procedure such
response supports sanctions.

question # 9 All video footage, documents, photographs, incident
reports, interviews / investigations on 10-7-20 that is described
in complaint or is related to such. Defendants state
"there does not appear to be any documents relating
to the 10-7-20 incident identified above" This is false.

Please see exhibit # 18 "Your allegations were investigated
and that investigation was reviewed by the bureau of
investigations and intelligence." Defendants did not do
due diligence at all. All disregard Honorable
Judge Canzillo orders. After 7 plus months its clear
defendant has no intentions of honoring judges
orders or rules of civil procedure. Defendants response
is bluntly in bad faith as there was a
investigation regarding this incident described and nothing
provided to plaintiff is in bad faith and support
sanctions.

question #10 All video footage, documents, photographs, incident
reports, interviews / investigations on 11-7-20 that is
described in complaint or is related to such (Excessive
Force / oe spray) Defendants state there are
no documents relating to the 11-7-20 incident
identified above. False. Any use of force 1st,
incident reports will be written. Any oe sprayed

a investigation would be began and investigated.

Defendants are bluntly disregarding rules of civil procedure and Judges order granting plaintiffs motion to compel. Such response supports motions.

question #11 Please provide all grievances plaintiff filed while at S.C.T. Forest between march 2019 to April 2021

Defendants do not provide discovery requested. At this point is no surprise. Defendants state they provide grievances 795379, 795381, 796182, 796397, 796828, 796834, 802863, 803671, and 803676. Note the first five plaintiff received. But only two pertain to this instant complaint (795379 and 795381) grievances 796182, 796397 and 796828 do not pertain to this instant complaint. Plaintiff only motions to show defendants responded in bad faith. Plaintiff request all grievances filed from march 2019 to April 2021 which is all during times in this instant complaint.

question #18 All 709 (restriction forms) that was lodged on plaintiff From march 2019 through April 2021.

Defendants respond "See attached documents!"

No restriction forms are attached or sent to plaintiff. Such response is in bad faith. At this

point plaintiff is confused and angry that defendants appear to have some immunity to do as the please and ignore a Judges orders after 7 plus months of providing no discovery and disregarding judges orders.

question #13 medical records of plaintiff from March 2019 through April 2021. Defendants state

"see attached medical records from 2019 through 2021."

False. Defendants provided medical progress notes in

alleged time and not plaintiffs medical records. Defendant Scott Bradley is aware what medical records are such

response is in bad faith Plaintiff request medical records

From March 2019 through April 2021 (time at Forrest and times named in complaint).

questions #14, #15 #16 #17 #18 #19. Plaintiff request certain

sections of policy that are relevant to plaintiffs complaint.

in all request. Defendant states "this will be

made available to you" for all questions (#14, #15 #16 #17 #18 #19)

Plaintiff has yet to review such. Plaintiff was not sent

such at all and has not been told such

requested documents were sent to anyone for

plaintiff to review.

Exhibit 19 Plaintiff's request for Production of Documents
Electronically stored video, photographs and audio (Second)

question #3 D17 X records of Plaintiff the whole time plaintiff was housed at S.C.I. Forest in 2019 2020 and 2021.

of course defendants did not provide the documents and state such will be supplemented to plaintiff.

Although plaintiff sent this discovery request over

7 months ago defendants disregard the judges

order granting plaintiffs motion to compel.

question #5 copy of religious accomodation form that display all Jewish holidays Fast or any observance.

Defendants state "see attached". Nothing was

attached do documents pertaining to the interrogatory

this response is in bad faith and defendant here shows

a pattern of such. Nothing was provided. The fact

the defendants continue to do such supports sanctions.

question #6 copy of Jewish Kosher menu at all time plaintiff

was on the Kosher meal diet while housed at S.C.I. Forest.

Defendants state "see attached D.o.c. Kosher sample menu contents and food handling instructions" Nothing was

attached or provided. Defendants not only falsify

documents but disregard Judges orders to provide

Plaintiff all discovery by granting plaintiffs motion

to compel its mind boggling that defendants can

do such without no reprimand. Defendants does such

as Plaintiff is 80-82.
80829

question #7 All documents that is required to obtain a Kosher diet and to be taken off a Kosher diet.

Defendants state "www.cor.gov." has these documents which defendants is where plaintiff does not have access to such request is the purpose of discovery. of course such response is in bad faith and unresponsive.

question #8 copy of form that display why plaintiff was taken off the Kosher diet and any/all documents that

support such decision Defendants state see

"File produced in response to request S herein"

No file was produced in response S. such response

is in bad faith,unresponsive and disregard judges

order granting plaintiffs motion to compel after

defendants repeatedly ignored plaintiffs discovery request for

7 plus months.

question #9 All documents in file plaintiff File held

by Hill, Blomm, or shaffer (Defendants) that is in

anyway involved with plaintiff on Kosher diet taken

off Kosher diet or Jewish Fast Defendants state see "File

produced in response to request S herein" No file was produced

in response S such response is in bad faith,unresponsive and

disregard judges order granting plaintiffs motion to compel

after defendants ignored plaintiffs discovery request for

7 plus months.

a record of this information. Furthermore plaintiff asked to estimate just to have a understanding Defendants has done such cell extractions before and the # can determine his knowledge / experience which is correlated to plaintiffs claim.

question #4 Have you ever been accused or investigated for excessive force Defendants provide a vague and automated response. These are very simple and standard questions that clearly pertain to plaintiffs claim. Anyhow response is vague and unresponsive. Defendants do such in bad faith.

question #5 Have you ever been disciplined, demoted, reprimanded, or suspended while working for the P.O.C.?

Defendants provide a vague response and not concrete in which a Jury may understand. If such response is yay or nay regarding evidence in this claim. Such question is relevant to show Defendant is capable of things that may against job description.

question #7 How much time total have you been working in level 5 housing unit.

Defendants appear to make the issue that Plaintiff did not provide a legible or readable question. Plaintiffs question is clear and readable. Defendants refuse to answer question in bad faith which is a pattern which Plaintiff will show throughout this Brief/motion.

interrogatories (Kathleen Hill) exhibit #7 question #1 Please
State the date you began your employment with the
Department of Corrections. Defendants state they will provide
this information when "proper authorities" obtain such
information. Defendants had 7 months to get this
information as defendants had this interrogatory request
7 months ago which is mind boggling as violates
many aspects regarding civil procedure and the
Judges orders. Defendants response is in bad faith
as any employee knows when they began their
employment and dates. Defendants is clearly acting
in bad faith.

question #2. Did you miss any time off due to injury
due to incident with plaintiff on 4-7-19?

Defendant responds that they don't want to give
this information to a inmate. Plaintiff is a
Prose litigant. Beyond that such information is
not privileged and very much correlated
to plaintiff's claim. Response is in bad faith.

question #4 Did you go to the hospital due to injury
after incident with plaintiff on 4-7-19?

Defendants state "see EOR report previously provided"
No EOR speaks of a hospital trip. Beyond that
response is vague and unresponsive. Clearly a standard
simple question that is very much correlated to plaintiff's
claim.

Interrogatories LT Deal exhibit #3 question # 5 were
You directed to keep Plaintiff in restraint chair, F
so who? Defendants state they don't know what
date Plaintiff is speaking on Defendant Deal is
on Plaintiff in one date or complaint as
a defendant which is 8-17-19 Plaintiff request
defendants answer such interrogatory.

question #6 Have you ever been under investigation
for excessive force? Defendants states such is
not relevant to case, which is false Plaintiff states
in complaint that defendant deal left Plaintiff in
restraint chair unjustified even when Plaintiff's restrictions
form stated "escort only" for restraint chair usage.

Claim is very much correlated to Plaintiff's claim and
is relevant Plaintiff request this interrogatory approached
as it is relevant to claim.

question #7 Have you ever been disciplined, demoted, disciplined
or suspended while working for the Department of
Corrections. Defendants state such is over broad and
exceeds the scope of matters in complaint false
such response is correlated to claim as it can show
pattern, state of mind and defendants approach to
D.O.C rules and civil rights Plaintiff's claims is correlated
to interrogatory as defendant has a possibility of
violating rules if done before

interrogatories (Fajbik) exhibit #4 question #3 If a inmate states he can't breathe do you think it's appropriate to continue to hold a person neck down defendants state such interrogatory "assumes facts not in evidence". Note plaintiff stated defendant Fajbik grab him by the neck and squeezed his neck and held him down with all his weight which is iterated in complaint which is very much relevant to plaintiffs claim. Such objection is in bad faith.

question #4 How tall are you and how much do you weigh. Defendants state such exceeds the scope of the matters complained of in False. Plaintiff iterated defendant Fajbik is well over 300 pounds and at least 6'3 tall which is relevant as plaintiff stated in complaint defendant Fajbik pin plaintiff down by his neck and placed all his weight on plaintiffs neck which can/will show the possibility of a broken neck or death due to such force and weight also supports the fact that plaintiff suffered a concussion. This interrogatory is very much relevant to plaintiffs claims.

question #6 How many unplanned/planned use of force you have been a part of. C If you don't know please estimate.

Defendants state they cannot estimate. Not only can they (defendant) estimate this information can be found out with ease "business as usual" which shows such unresponsive interrogatory was in bad faith.

question # 8 Have you ever been demoted, disciplined,
reprimanded, suspended or counseled while working for
Department of corrections? Defendants state such
interrogatory exceeds scope of matters complained
of in. False. Defendants could've very much been
disciplined for plaintiffs claim. Beyond that such
shows defendants state of mind and inclination towards
defendants approach to his duties and if defendants
ever acted outside the scope of duties.

question # 10 Have you ever been under investigation for
excessive Force excluding plaintiffs claim. Defendants
state plaintiffs interrogatory request exceeds the
scope of the matters complained of in false.
Plaintiff stated defendant used excessive force
against plaintiff. Such response can show state
of mind and defendants possibility to commit
excessive force.

Exhibit #5 interrogatory (Mr. Klemm) question #9 Is it normal to have any bugs in any Kosher vegetables

Defendant's response is "defendant is not aware of reports of any bugs in any vegetables."

which is not the interrogatory Plaintiff asked.

Defendant's response is clearly vague and unresponsive as another question was responded to instead of interrogatory.

question #10 Is it normal to have any rotten apples/

oranges in any Kosher fruits defendant response

is "defendant is not aware of reports of any rotten apples or oranges in any fruits" which is unresponsive and a vague response and don't approach the interrogatory at hand.

interrogatory (mcgill) exhibit #6 question # 7 were you

ever counseled, disciplined, reprimanded or suspended while

working for the department of corrections. Defendants

state even exceeds the scope of matters

composed of un. False. such claim is often iterated

in Plaintiff claim stating defendant mcgill consistently antagonize Plaintiff. Such response can show defendants

state of mind and how bad defendants perform

his scope of duties or inclination towards D.O.C.

Code of Ethics / policy.

question #10 How long have you been a registered nurse?

Defendant states such interrogatory is not relevant to Plaintiff's claims. False. Plaintiff states defendant might did something out his scope of duties as a nurse and improperly tube-fed Plaintiff. the time defendant might have been a nurse may dictate his knowledge and expertise in medical procedures which can show defendant had proper knowledge of tube feedings and the proper way to do such.

Exhibit #7 interrogatory (Bonnie Bell) question #1 Please state the date you began your employment with the department of corrections.

Defendants state such interrogatory will be supplemented although defendants received this interrogatory request over 7 months ago such is done in bad Faith as such request is simple and automatics.

question # 7 Before feeding a person is it required to lube or wet the tip that is being inserted or is it best to use it dry with no lube or ointment /water.

Defendant provides a vague and unresponsive response in bad Faith. Defendant knew "Force feeding" is iterated through complaint and is very much "tube feeding". Defendant adamant on refusing to respond to Force Feeding when all other defendants responded to such is in bad Faith.

question #3 Do you think any pain should be felt during a Force Feeding. Defendants provide a vague and unresponsive response in bad faith. Force Feeding is listed in initial complaint and rest of defendants responded to "Force Feeding". Beyond that defendant knows what Force Feeding is. Such response is in bad faith.

question #4 In your medical opinion as a nurse do you think it is accurate to Jam the Force Feeding tube into a person nose or gradually insert in a person nose. Defendants provide a vague unresponsive response stuck on the word "Force Feeding" and provide a robotic response that dont respond to interrogatory in bad faith.

question #5 Have you ever worked at a hospital?

Defendants state such response will be supplemented to Plaintiff Plaintiff sent this interrogatory request over 7 months ago. After numerous of motion to compel and the granted motion of compel defendants response is clearly in bad faith or defendants was given a order to respond but still dont.

question # 6 Have you ever been in any branch of the military? If so which one and was you honorably discharged. Defendants state such request will be supplemented. although such was requested over 7 months ago such response is in bad Faith.

question # 7 Have you ever performed a Force Feeding before Plaintiff? If so please provide an estimate on how many. Defendants response are vague and unresponsive making it appear that Force Feeding is a foreign word. Although medical term is "tube Feeding" Defendants know what Force Feeding is as such is a D.O.C term and also littered in complaint. Such response is in bad Faith.

question # 8 Is it possible to resist a Force Feeding if a person is not moving his body, neck or head. Defendants response is I do not Force feed any inmate. Such response is in bad Faith as Force Feeding is very much correlated to tube Feeding and such is stated throughout plaintiffs complaint. Defendants response is in bad Faith.

Question # 10 Please identify, name, describe what policy, procedure or memorandum you used to reference while force feeding Plaintiff.

Defendant's response is in bad faith as Defendant just state "I do not force feed any inmate." Defendant is well aware of Force Feeding which is a D.O.C. term. And such is in Plaintiff's complaint and only claims Plaintiff brings against defendant. Such response is in bad faith.

Exhibit #8 interrogatory (Caltagirone) question # 1 - Please state the date you started your employment for the Department of corrections. Defendants state such response will be supplemented to Plaintiff. Note Defendants was given an order to compel discovery over 30 days after Plaintiff sent the interrogatory request over 7 months ago. This is clearly in bad faith as Defendants had 7 months to respond to this interrogatory.

question #6 Have you ever been disciplined, demoted, counseled or reprimanded. Defendants state "Not to the best of Defendant recollection." which is vague and unresponsive as such could've taken place and is documented but it appears Defendants aim to avoid question and not provided a blunt responsive interrogatory which is done in bad faith. This information is something that can be proven or false. This response appears to be on the fence which is not accepted as this is civil litigation. Such response is in bad faith.

question #7 have you ever been accused of excessive force excluding Plaintiff's claims. Defendants response state "Not to the best of answering defendants recollection" such response is vague and unresponsive. As such response leaves the door open as if such could've taken place instead of provided a response that completely answer interrogatory. such response is in bad faith and vague/unresponsive.

question # 8 How long have worked in a level 5 housing unit while you worked for the Department of corrections.

Defendants state they will need to supplement this response at a later date. Defendants had 7 plus months to respond to this interrogatory. This is a standard question. After 7 plus months and a order for the Judge granting motion to compel from Plaintiff and no answer this was done in bad faith.

question # 9 on a estimate how many times have you utilized a double secure wicket while working for D.O.C. in a level 5 housing unit. (If you don't know exactly please estimate) Defendant state that he cannot estimate which is in bad faith. The purpose of such estimation was to ensure a response as a exact number number may be difficult to pinpoint such response is in bad faith as to estimate is to attempt to find a number to support or respond to interrogatory note such claim is correlated to Plaintiff's claim as defendant is accused of closing Plaintiff's arm/hand in slot intentionally to cause harm. such response is in bad faith.

Exhibit #9 interrogatory (G.11) question #1 Please state the date you began your employment with the Department of Corrections and please state all titles while working for D.O.C including dates Defendant states this information will be supplemented. This interrogatory was sent over 7 months ago. Defendants are abusing civil rules of procedure. And disregard the Judges order regarding motion to compel which was granted in plaintiffs favor. Response is in bad faith.

question #6 When a cell is contaminated with O/C spray Please iterate what measures are to be taken to decontaminate such cell / Area. Defendants response is vague and unresponsive by stating "there is a procedure in place once O/C is sprayed" such response does not respond to interrogatory and is unresponsive and vague.

question #8. Have you been demoted. Plaintiff Defendants response stating not to my recollection is vague and unresponsive and is done in bad faith. such response is relevant to this complaint as plaintiff has stated defendant has acted outside his scope of duties.

Exhibit #10 Interrogatory (Brown) question #1 Please state
the date you started your employment at Department
of corrections including titles. Defendants state such response
will be supplemented to Plaintiff although defendants had
7 plus months to answer this interrogatory such response
not only violate rules of civil procedure but such response
is in bad faith after 7 months to compel and
Judge magistrate Izurza granting Plaintiff's motion to compel
to respond to Plaintiff's motion to compel. Defendants still do
not respond in bad faith.

question #3 Have you ever received training regarding
Force Feeding? Defendants state "Department of corrections
does not force feed inmates, they do court ordered tube
feedings." Such response iterate that defendants know exactly
what plaintiff is stating when force feedings is mentioned.
Beyond that such "force feedings" is stated in complaint
and is the only claim defendants are complained of
in complaint. Such response is in bad faith as "force
feedings" is very much "tube feedings." Beyond that it is
called Force Feeding in D.o.C.

question #4 Have you ever performed a force feeding before
you force fed Plaintiff? Defendants appear to Not Know
what "Force Feedings" are although such is mentioned all
throughout complaint which name defendant such response is
in bad faith.

question # 7 How many force feedings have you performed?

If exact number is not known please estimate. Defendants

state they cannot estimate in bad faith. Defendant continue

to disregard magistrate Judges order to compel discovery

after ignoring plaintiffs request for 7 plus months. Defendants

have abused this process due to plaintiff being

Prone.

Please see exhibit # 11 #12 #13 Defendants still did not

respond to these interrogatory request even after the

Judges order granting plaintiffs motion to compel. 7 plus

months have passed and defendants clearly in bad

Faith disregard Rules of civil procedure and the Judges

order to compel discovery after 7 months of ignoring

plaintiff. Defendants appear to be above civil procedure

and have immunity as the disregard for civil procedure and

the judges orders are very much evident and support

Sanctions. Plaintiff request a response to interrogatories

(exhibits #11 #12 #13) and sanctions against defendants.

Exhibit #4 Plaintiff request For production of Documents

electronically stored, video, photographs and Audio.

question #3 All video footage, documents, photographs, incident reports, interviews/investigations on 5-21-19 that is described in complaint or is related to such (cell extraction sprayed with O.C. T.B.I.D.)

Defendants response is in bad Faith as this incident occurred on 5-21-19 was investigated by Bureau of investigations and intelligence (B.I.I) please see exhibit #15. Defendants

withdrew such documents and investigation documents.

Beyond that plaintiff has not been provided no photographs at all regarding this incident only (2) initial reports.

Defendants withheld such documents and photographs in bad Faith which support sanctions due to magistrate Judge ordering defendants to provide plaintiff discovery granting plaintiffs motion to compel.

question #3 All video footage, documents, photographs, incident reports, interview / investigation on 5-21-19 that is described in complaint or is related to such (dry cell abuse)

Defendants response is in bad Faith. No documents have been provided nor photographs Please see exhibit #16

Defendants state "medical records and attached photos." None was supplied in bad Faith. exhibit #16 States this incident was reviewed by the Bureau of investigations and intelligence (B.I.I). Defendants provide no documents in bad Faith and no video in bad Faith.

question #10 All emails defendants Hill, Klein, / Shaffer
correspondence with each other regarding Plaintiff and his
Jewish Faith and diet. Defendants state "see Plaintiffs
religious file produced in response to request S"

No file was produced in response S such response is
in bad Faith, unresponsive and disregard judges order
granting plaintiffs motion to compel after defendants
ignored plaintiffs discovery request for 7 plus months.

question #18 Please name the restraint chair provider that was
used on plaintiff that is described in complaint.

Defendants state they cannot exactly be certain what
Chair was used. False. All use of Force items are
logged and named. Such response is in bad faith.

And with proper investigation this could easily been
found out. Defendants continue to be unresponsive and
respond in bad faith.

question #19 copy of level S housing unit handbook at S.C.I.
Forest when plaintiff was housed there in incidents
described in complaint. Defendants state handbook
attached. False nothing has been provided. Defendants
aim to mislead and falsify documents. Such response
is in bad faith. Plaintiff never received this
handbook. This supports sanctions.

question # 20, #21, #22, #23, #24 and #25 Plaintiff requested
the following policies (§10 Food services) (001 inmate abuse)
(201 use of Force) (13.0.01 access to Health care) (13.0.01 management
and administration of Healthcare) (15.0.01 (Safety))

Defendants state Plaintiff is to go to
www.cor.pa.gov. Plaintiff does not have access to
such. Plaintiff has wrote law library to no avail.

Such policies are relevant to complaint and plaintiff's
claims and such response is "business as usual" defendants
response is in bad faith.

Plaintiff request this motion granted in
its entirety.


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